UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED 2008 MAR 28 PM 12:53

UNITED STATES OF AMERICA, Plaintiff, v. **DEF#1) Jorge CAMACHO, DEF#2) Arnoulfo SALAZAR-Barreto** Defendant(s)	)	Magistrate Case No. '08 MJ 0960 COMPLAINT FOR VIOLATION OF: Title 8 U.S.C., Sec. 1324 (a)(1)(A)(ii) Transportation of Illegal Aliens

The undersigned complainant, being duly sworn, states:

On or about **March 27, 2008,** within the Southern District of California, defendants **Jorge CAMACHO and Arnoulfo SALAZAR-Barreto** with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, **Jose Angel PAVON-Gonzalez, Gabriel RAMON-Valerio,** and **Oscar VALDES-Rivas** had come to, entered and remained in the United States in violation of law, did transport and move, said aliens within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

SIGNATURE OF COMPLAINANT
James Trombley
Senior Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **28th** DAY OF **MARCH, 2008.**

William McCurine Jr.
UNITED STATES MAGISTRATE JUDGE

CONTINUATION OF COMPLAINT:
DEF#1) Jorge CAMACHO,
DEF#2) Arnoulfo SALAZAR-Barreto

PROBABLE CAUSE STATEMENT

Furthermore, the complainant states that , **Jose Angel PAVON-Gonzalez, Gabriel RAMON-Valerio,** and **Oscar VALDES-Rivas** are citizens of a country other than the United States; that said aliens have admitted that they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On March 27, 2008, San Diego Sector North County Border Patrol Agents were assigned to work the Interstate 15 (I-15) corridor near the Temecula Border Patrol Checkpoint. Agents were working in unmarked service vehicles and in a plain-clothes capacity. At approximately 1:00 p.m., Agent P. Castillo was conducting surveillance approximately seven miles south of the checkpoint when he noticed a Red Dodge Pick up truck and a Blue Jeep Cherokee come into an area and stop in the middle of the parking lanes, just beside where Agent Castillo was positioned and exchange some words and what appeared to be a cellular phone. Agent Castillo noticed the Jeep Cherokee heavily laden with several passengers, including some in the rear in a crouched position attempting to conceal themselves. Both vehicles then exited the area and split up. The Red Dodge turned left towards the I-15 and the Blue Jeep turned right onto Highway 76.

Agent Castillo advised other agents and exited the area in attempt to maintain surveillance on the Jeep Cherokee and ran record checks on the vehicle as it pulled into a Mobil gas station. Record checks returned with a positive alert of a stolen vehicle. Agent S. Smith arrived at the location and also began surveillance of the Jeep, its occupants and the driver. Agents had constant surveillance of the driver as he purchased items from a stand and appeared to be on a cell phone constantly. Agents waited until the driver returned to Jeep and sat in the driver seat. At that time, Agents Smith, J. Pederson, Castillo and Supervisory Border Patrol Agent A. Velez approached the vehicle and identified themselves as Border Patrol Agents to the driver and occupants of the Jeep. The driver later identified as defendant **Jorge CAMACHO**, was detained for further investigation of the vehicles' status. A total of five passengers were found to be seated in the vehicle. The passengers were interviewed and questioned as to their citizenship. All passengers stated that they were undocumented citizens and nationals of Mexico illegally present in the United States. The defendant was also questioned as to his immigration status, to which he stated that he was a citizen of the United States. At 1:20 p.m., the defendant and the five occupants were placed into service custody and transported to the Murrieta Border Patrol Station for processing.

DEF#1) Jorge CAMACHO,
DEF#2) Arnoulfo SALAZAR-Barreto

DEFENDANT STATEMENT: (Arnoulfo SALAZAR-Barreto)

Defendant Arnoulfo SALAZAR-Barreto was advised of his Miranda rights. He stated he understood his rights and was willing to answer questions without the presence of an attorney.

SALAZAR stated that he was born in Mexico and he has never had any immigration documents allowing him to enter or reside in the United States legally.

SALAZAR stated that he had been arrested by the Border Patrol thirteen or fourteen times. He was asked if he was the foot guide in this occasion. He stated that he and another person were guiding the group. SALAZAR stated that once they reached their pick up point the other foot guide returned back to Mexico. SALAZAR stated that he was to get a $1000.00 reduction in his fee, if he would guide the group. SALAZAR admitted that he knew that the people he was guiding were undocumented illegal aliens.

MATERIAL WITNESSES STATEMENTS:

Material witnesses **Jose Angel PAVON-Gonzalez, Gabriel RAMON-Valerio,** and **Oscar VALDES-Rivas** agree in summary that they are citizens and nationals of Mexico illegally present in the United States. They admit to entering the United States illegally. The material witnesses stated that they were to pay $2,000 (US) to be smuggled into the United States. All three material witnesses were shown a photographic line up and were able to identify defendant #1 **Jorge CAMACHO** as the driver of the vehicle and defendant #2 **Arnoulfo SALAZAR-Barreto** as the person who guided them on foot.

James Trombley
Senior Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **28th** DAY OF **MARCH, 2008.**

William McCurine Jr.
United States Magistrate Judge